

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NOVELPOINT SECURITY LLC,

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC.,

Defendant.

Case No. 2:12-cv-116

PATENT CASE

JURY TRIAL DEMANDED

**AGREED MOTION FOR STAY OF PROCEEDINGS
PENDING FINALIZATION OF SETTLEMENT**

Plaintiff NovelPoint Security LLC (“NovelPoint”) hereby files this Agreed Motion for Stay of Proceedings Pending Finalization of Settlement in this case, and in support thereof shows the Court as follows:

NovelPoint and Defendant Motorola Solutions, Inc. (“Motorola”) have agreed to a settlement of this case, and they are in the process of performing under their settlement agreement. Pursuant to the settlement agreement, the parties anticipate that an agreed motion to dismiss this case can be filed with the Court in approximately three weeks. The requested stay would run until Wednesday, August 8, 2012. The parties further request that if the dismissal cannot be completed by August 8, 2012, the stay will automatically expire absent a further motion for good cause shown, and Motorola will have a deadline of Wednesday, August 22, 2012, to answer or otherwise respond to the Complaint. A proposed order granting this Agreed Motion is attached.

Wherefore, Plaintiff NovelPoint Security LLC respectfully requests that the Court enter the proposed order submitted with this Motion as set forth above, and grant the parties such other and further relief to which they are entitled.

Dated: July 19, 2012

Respectfully submitted,

/s/ Craig Tadlock
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Attorneys for Defendant Motorola Solutions, Inc.

CERTIFICATE OF CONFERENCE

I hereby certify that on July 19, 2012, I conferred by email with counsel for Defendant Motorola Solutions, Inc., at Potter Minton, P.C., 110 N. College Ave., Suite 500, Tyler, Texas 75702, phone 903-597-8311. Counsel for Motorola and I agreed to the form and substance of this motion and all relief requested therein. Accordingly, this motion is an agreed motion.

/s/ Craig Tadlock
Craig Tadlock

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 19th day of July, 2012, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Craig Tadlock
Craig Tadlock